

Nelson Mullins

Nelson Mullins Riley & Scarborough LLP
Attorneys and Counselors at Law
101 Constitution Avenue, NW / Suite 900 / Washington, DC 20001
Tel: 202.712.2800 Fax: 202.545.2958
www.nelsonmullins.com

George E. Kostel
Tel: 202.545.2969
Fax: 202.545.2958
george.kostel@nelsonmullins.com

February 10, 2012

VIA ELECTRONIC AND REGULAR MAIL

Kristi C. Kelly, Esq.
Surovell, Isaacs, Petersen & Levy, PLC
4010 University Drive, Suite 200
Fairfax, VA 22030

Re: *Sandra J. Berrios v. Experian Information Solutions, Inc., et al.*
U.S. District Court for the Eastern District of Virginia;
Civil Action No. 1:11-cv-01130-AJT-IDD

Dear Kristi:

Thank you for your time on the telephone yesterday and for sending over the proposed protective order. I am fine with the form but want to look at it once more for details. In light of our anticipated agreement and pursuant to my letter and our discussion yesterday, I will have delivered to you today the supplemental documents regarding Ms. Barrios and her account that we discussed, as well as the training and procedure manuals.

I am also delivering on Monday supplemental interrogatory responses that capture the information you requested yesterday, even if not in response to each of the many overlapping interrogatories that were posed. Based on your proposed order, I understand that getting this information on Monday poses no problem.

Let me know what else we discussed that may not appear in the documents or be gleaned through the supplemental interrogatory answers. I would ask that you treat them all as "confidential" until I confirm otherwise. I know the manuals will be designated at some level.

With regard to the proposed discovery order, absent a motion, it is not my practice to use them. As I indicated, I will deliver what was promised to the extent it is in our possession. I believe my letter and our conversation are the best reflection of what was agreed. If you do want to send something to the Court, it would have to reflect the entirety of our discussion, to include your agreement to withdraw or combine certain requests, and that I maintain the objection to the temporal scope of your requests. I will send our production today, and we can

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work through any remaining issues as they arise, once you have had a chance to review the supplemental information.

Also please let me know if you decide to re-visit your position regarding the deposition notices. I understand from our conversation that the notices will not be reissued along with the necessary subpoenas and reflecting Michigan location.

Very truly yours,



George E. Kostel

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cc: Scott Surovell, Esq. (e-mail only)